# Administrative Review Report

Arcadia School District

Schedule Type	Start Date	End Date
On-Site Review	02/17/2020	02/18/2020
Exit Conference	02/18/2020	02/18/2020

#### **Commendations:**

Thank you to the staff at Arcadia School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

#### Recommendations:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills
  Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover
  many areas of the school nutrition programs including administrative responsibilities, program basics, meal
  pattern requirements and menu planning, financial management, professional standards, procurement, and
  many other topics. More information along with other upcoming trainings and webinars can be found on the
  Wisconsin DPI School Nutrition Training webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI <u>School Nutrition Training</u> webpage (dpi.wi.gov/school-nutrition/training/goal-orientedachievement-learning-skills).

### **Findings and Corrective Action:**

Form Name	Maintenance of Non-Pro	Naintenance of Non-Profit School Food Service Account (700 - 705)					
Question #	700	00					
TA Log#	TA Log# exists						
Corrective Action Status	Flagged	lagged					
Corrective Action History	Flagged 02/17/2020 04:48 PM	Finding: On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19).  CA: Review the Annual Financial Report webcast or manual on the DPI website then update the 2018-19 Annual Financial Report with revenues and expenses broken out by program and category. Upload the corrected report into SNACS. Once approved, the report will need to be updated in the online portal. The DPI accountant will make any adjustments after December 31.					
Form Name	Revenue From Non-Pro	gram Foods (709 - 711)					
Question #	709	709					
TA Log#	TA Log# exists	TA Log# exists					
Corrective Action Status	Flagged						

# Administrative Review Report

	Al Ca	dia School district			
Corrective Action History	Flagged 01/14/2020 10:34 AM	Finding: SFA did not complete the DPI Nonprogram Foods Revenue Tool or USDA Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14.  CA 1: Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5 day reference period from the current school year.  CA 2: Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing. Include the position responsible for ensuring this is completed.			
Form Name	Civil Rights (800 - 807)				
Question #	800				
Corrective Action Status	Flagged				
Corrective Action History	Flagged 02/10/2020 10:20 AM	Finding: The USDA nondiscrimination statement on the school website menu page is incorrect. If utilizing the shortened statement, it must state, "This institution is an equal opportunity provider."  CA: Please update website with correct nondiscrimination statement.			
Form Name	Civil Rights (800 - 807)				
Question #	804				
Corrective Action Status	Flagged				
Corrective Action History	Flagged 01/14/2020 12:00 PM	Finding: The SFA does not have a system for tracking discrimination complaints received for the school meal program (FNS Instruction 113-1).  CA: Provide a statement of how discrimination complaints received for school meal programs will be tracked and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
Form Name	Civil Rights (800 - 807)				
Question #	805				
Corrective Action Status	Flagged				
Corrective Action History	Flagged 01/14/2020 02:14 PM	Finding: Current Accommodating Disabilities Policy contains outdated requirements. Statement must include student's medical condition or symptoms of a condition that restricts major life activity or function; an explanation of how the condition or symptom affects the student's diet;  CA: Provide a timeline to update the policy.			
Form Name	Local School Wellness (:	1000 - 1006)			
Question #	1000				
	I				

# Administrative Review Report

Corrective Action Status	Flagged				
Corrective Action History	Flagged 01/14/2020 12:11 PM	Finding: Current Local Wellness Policy (LWP) does not include all of the required content (Guidelines for food provided but not sold and Food & Deverage Marketing) (7 CFR 210.31).  CA: Submit a timeline for bringing the LWP into compliance and include the title(s) of the SFA representative(s) that will ensure compliance.			
Form Name	Certification and Benefit	t Issuance (124 - 142)			
Question #	126				
Corrective Action Status	Flagged				
Corrective Action History	Flagged 02/17/2020 05:06 PM	380 free and reduced price meal application determinations were reviewed, and only 1 error was identified. Finding: From the student sample reviewed for benefit's issuance, 1 student is receiving free categorical benefits with an invalid case number.  CA: Please follow-up with this household to obtain a valid case number. If unable to do so, please notify this household of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Record date that corrective action is taken on the SFA-1 form and send completed copy as corrective action. Fiscal action will be calculated for these errors for the review period (January) and month of on-site review (February). Completed onsite. No further action required			
Form Name	Certification and Benefi	t Issuance (124 - 142)			
Question#	133				
TA Log #	TA Log# exists				
Corrective Action Status	Flagged				
Corrective Action History	Flagged 02/18/2020 08:33 AM	Finding: Students directly certified had their benefit starting on the first day of school and should have been the date of file upload.  CA: Provide a statement that going forward, the date of eligibility will be the date of file upload or determination.			
Form Name	Verification (207 - 215)				
Question #	215				
Corrective Action Status	Flagged				
Corrective Action History	Flagged 02/05/2020 10:19 AM	Finding: The SFA did not complete the verification process by November 15 and was not approved for an extension (7 CFR 245.6a).			

# Administrative Review Report

		CA: Provide a statement detailing the process the SFA will follow to ensure verification is completed within the required time frame.
Form Name	Civil Rights (809 - 810)	
Question #	810	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/05/2020 09:24 AM	Finding: The non-discrimination statement was altered on the Direct Certification letter and was not included on all program materials.  CA: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated. Completed onsite, no further action required.
Site Name	Arcadia High School	
Form Name	Meal Components and C	Quantities - Day of Review (400-408)
Question #	401	
TA Log#	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/18/2020 05:37 PM	Finding: Four non-reimbursable meals observed at breakfast.  Corrective Action:  1) Have staff responsible for determining reimbursable meals view the following training on OVS. Both of these webcasts cover OVS in both breakfast and lunch and will serve as a good refresher to the unique requirements of each program.  • Offer versus Serve webcast (60min) (https://media.dpi.wi.gov/school-nutrition/offerversus-serve/story_html5.html)  • Offer versus Serve lesson game (30 min) (https://media.dpi.wi.gov/school-nutrition/offerversus-serve-meal-or-no-meal/story_html5.html)  Please submit details regarding when and where the training was held, and the names of who attended.  2) Submit a statement that explains how you will ensure that students will be trained on what they need to take for a reimbursable meal.
Site Name	Arcadia High School	·
Form Name	Meal Components and C	Quantities - Day of Review (400-408)
Question #	404	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	

# Administrative Review Report

	AlCa	dia School District
Corrective Action History	Flagged 02/18/2020 05:43 PM	Finding 1: Breakfast signage must indicate that students must select at least ½ cup fruit and/or vegetable, or a combination with a reimbursable meal. Additionally, it should list how the food items are counted. For example, if an UBR is menued, then the signage should say that the UBR counts as two items. Currently, signage does not list this.  Corrective Action: Submit a picture of the updated signage that includes the verbiage about the requirement of a ½ cup fruit and/or vegetable and shows how each food item counts.  Finding 2: Signage was not posted at lunch to show students what makes up a reimbursable meal. Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination.  Signage examples can be found on our Signage webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).  Corrective Action: Submit a picture of completed signage posted near the beginning of the lunch service line.
Site Name	Arcadia High School	
Form Name	Meal Components and C	Quantities - Review Period (409-412)
Question #	409	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/18/2020 05:50 PM	Finding 1: Production records missing the following key pieces of information:  • Site name  • Age/grade groups served  Corrective Action: Submit your production record template that shows that the information listed above is now included.  Finding 2: There were no serving sizes on the garden bar production records. Garden bar production records must meet the same criteria as production records used to record main line items. Review the Production Record Requirements.  Corrective Action: Submit updated salad bar production records for one day with serving sizes for each menu item. Choose a day after the administrative review and before the corrective action due date. Although not required, DPI's

# Administrative Review Report

	Ai ca	dia School district			
		Salad Bar or Garden Bar <u>Production Records</u> may be used (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records).			
Site Name	Arcadia High School				
Form Name	Meal Components and C	Quantities - Review Period (409-412)			
Question #	410				
TA Log#	TA Log# exists				
Corrective Action Status	Flagged				
Corrective Action History	Flagged 02/18/2020 05:54 PM	Finding: The Italian spaghetti and meatball recipe must be updated for clarity.  Corrective Action: Update and submit the revised Italian			
		spaghetti and meatball recipe.			
Site Name	Arcadia High School				
Form Name	Smart Snacks (1104 - 11	07)			
Question #	1104				
TA Log #	TA Log# exists				
Corrective Action Status	orrective Action Status Flagged				
Corrective Action History	Flagged 02/18/2020 06:29 PM	Finding 1: The 16 fl. Oz flavored whole milk bottles in the vending machine are not allowable. Only low-fat or fat-free milk in a 12 fl. Oz serving size is allowed at the high school level. More information can be found on WI DPI's Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).  Corrective Action: State what will be done with this product to comply with the Smart Snack regulations. Include specifics on who at the school will be responsible for tracking the FFA vending machine.  Finding 2: Beverages in vending machine in cafeteria area not being tracked.  Corrective Action: Submit a statement explaining how the school will begin tracking all beverages sold to students. Include specifics on who at the school will be responsible for tracking these beverages.  Finding 3: Regular Gatorate (20 fl. oz) is sold to students at the end of the school day and this beverage does not meet Smart Snacks standards. It is not allowable at the high school level because the calories exceed the limit. Only no-calorie (20 fl. oz) or low-calorie beverages (12 fl. oz) are allowed at the high school level. Additionally, candy was being sold and these items do not meet the regulations.			

# Administrative Review Report

Arcadia School District

		Corrective Action: State what will be done with the school store to comply with the Smart Snack regulations. Submit a statement explaining how the school will begin tracking all foods and beverages sold to students in the school store. Include specifics on who at the school will be responsible for tracking and maintaining documentation.			
Site Name	Arcadia High School				
Form Name	Food Safety, Storage and Buy American (1404-1411)				
Question #	1406				
Corrective Action Status	Flagged				
Corrective Action History	Flagged 02/18/2020 11:27 AM	Finding: The most recent food safety inspection report was not posted in a publicly visible location.  CA: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. Corrected onsite, no further action required.			
Site Name	Arcadia High School				
Form Name	Food Safety, Storage and	d Buy American (1404-1411)			
Question #	1411				
TA Log#	TA Log# exists				
Corrective Action Status	Flagged				
Corrective Action History	Flagged 02/18/2020 06:00 PM	Finding: The following products were identified in the SFA's storage area as non-domestic and not documented:  • Mandarin Oranges - China • Cucumber - Mexico  Corrective Action: Complete and submit Non-Compliant Product Forms for the products listed above (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american).			

### **Technical Assistance Entries:**

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
02/18/202	1709	1104	Administrative Review	Arcadia High School				

## **Comments**

### **Smart Snacks**

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. More information is available on WI DPI's <a href="Smart Snacks">Smart Snacks</a> webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).

While onsite at Arcadia High School, it was noted that the following are not in compliance with Smart Snacks standards:

## Administrative Review Report

Arcadia School District

FFA milk machine contains milk products that exceed the calorie and size limits for milk.

- Whole chocolate milk, 16 fl oz
- Whole mint flavored milk, 16 fl oz

Beverage vending machines (selling low-calorie energy drinks and no-calorie flavored waters). While the beverages sold are in compliance, there is not supporting documentation on file to support their compliance.

The school store sells regular Gatorade and candy. These food and beverage items do not comply with Smart Snacks standards.

If an organization is selling foods or beverages that meet the Smart Snacks standards: These foods or beverages may be sold at any time and in any location. The organization must keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator.

If the FFA and the school store wish to continue to sell food and beverages to students during the school day then the foods and beverages offered must meet Smart Snacks standards. Please the <a href="Smart Snacks">Smart Snacks</a> webpage for more information, including a helpful one-page summary on the regulations, a link to the Smart Snacks products calculator, and USDA's guide to Smart Snacks in schools (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).

If foods and beverages are not brought into compliance then they <u>may not</u> be sold during the school day which is from midnight of the instructional day until 30 minutes after the last school bell. If an organization is selling foods or beverages that do not meet the Smart Snacks standards: These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length. Exempt fundraisers cannot occur in the meal service area during meal times. Someone in the school must keep track of the exempt fundraisers.

02/18/2020 1708 1411 Administrative Arcadia High Review School
--

## **Comments**

### **Buy American**

There were no documents to support the purchase of non-domestic food items.

The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodities or products. A "Domestic Commodity or Product" is an agricultural commodity or product that is produced or processed in the United States using substantial (more than 51 percent) agricultural commodities that are produced in the United States (including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands).

The following information must be recorded on a Buy American Non-Compliant Product List:

Date

Name of product

Country of origin

Reason: Cost analysis, Seasonality, Availability, Substitution, Distribution, Other

A suggested Buy American - Non Compliant Product List template can be found on the <u>Buy American</u> webpage ( https://dpi.wi.gov/school-nutrition/procurement/buy-american).

For domestic products without country of origin labeling, consider the Buy American <u>Provision Attestation for Agricultural Product(s)</u> Purchased Between School and Contractor. By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision.

# Administrative Review Report

		•	Administrati	IVC ICVICVI	ricport			
			Arcadi	a School District				
02/18/2020	1707	410	Administrative Review	Arcadia High School				
				Comments				
butter (in bulk)	ter and je could be	used. Howev	recipe had writter ver, 2oz of bulk pea nust equal 2.2 oz in Administrative Review	nut butter does	not credit as	2 oz eq m	/ma. If you wis	sh to use
				Comments				
Standardized Recipes The Italian spaghetti and meatballs recipe needs to be updated for clarity. Since the noodles, meatballs and extra sauce are served separately on the service line, separate recipes should be created. It is recommended to create a recipe for the spaghetti noodles, and a separate recipe for the meatballs. The sauce that is served on the side does not need a recipe since nothing else is added to it.  O2/18/2020 1705 409 Administrative Arcadia High School								
				Comments				
		_	den bars and salad brogram-requirem  Administrative Review					5°
			_	Comments				
Production Records  Lunch production records need to include the following information:  ■ Planned serving sizes for the condiments.  Additionally, review the crediting on production records to ensure that it matches with the products you are using. Some products, such as the chicken nuggets had incorrect crediting on production records. Chicken nuggets were listed on production records as crediting as 2 oz eq meat/meat alternate (m/ma) and 2 oz eq grain, however, according to the product crediting documentation there is only 1 oz eq grain not 2 oz eq grain.								
02/18/2020	1703	409	Administrative Review	Arcadia High School				
			(	Comments				
Site nar	uction red		o include the follow	ving information	n:			
02/18/2020	1702	404	Administrative Review	Arcadia High School				
				Comments				

## **Lunch Signage**

Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The lunch signage should list the five components and inform

# Administrative Review Report

Arcadia School District

students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination. While there was reimbursable meal signage in use, the language used on the sign was intended for breakfast. Samples of signage that can be printed or updated and implemented in your school can be found on our Signage web page (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

02/18/2020	1701	404	Administrative Review	Arcadia High School				
C								

#### **Comments**

## **Breakfast Signage**

Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order for their meal to count as reimbursable. There is breakfast signage that lists the daily food items, however, it doesn't clarify how each food item counts (i.e., one item or two items). Additionally, signage must state that a ½ cup of fruit and/or vegetable is required.

Reminder, the menu planner must determine in advance whether items crediting as 2 oz eq count as one or two food items. The definition of a food item at breakfast is ½ cup fruit, 1 oz eq grain, and 1 cup milk. Therefore, the UBR breakfast round served on the day of observation credits as 2 oz eq grain, so it could be counted as either one or two food items. Point of Service staff and students were not aware of how the UBR round was crediting. Remember, the crediting must be clearly communicated to students and staff. Visit our <a href="Signage">Signage</a> webpage for more information and signage templates (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

02/18/2020	1700	401	Administrative	Arcadia High		
			Review	School		

#### Comments

#### **Breakfast Observation**

At breakfast meal service four non-reimbursable meals were counted as reimbursable. These meals contained three items (cereal, crackers, milk), but no fruit. The School Breakfast Program requires that four food items be offered from the three required components, which are grains, fruit and milk.

When using Offer versus Serve (OVS) students must select at least three food items, one of which is a  $\frac{1}{2}$  cup fruit. An item is defined as 1 cup milk,  $\frac{1}{2}$  cup fruit and 1 oz eq grain. Menu planners may also offer meat/meat alternates (in addition to grains) or vegetables, if desired. Visit our Menu Planning page for more information on OVS (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning).

Additionally, many students came to the point of service (POS) without the required number of items. The staff person recognized these meals as not containing the correct amount of items, however, when the students were sent back to the line to select another item, many times the student did not select a fruit and continued onto their classroom.

Students should not enter their pin number into the computer if they do not have a reimbursable meal. Students should be sent back prior to entering their pin number and then they must return to the POS to enter their pin number once they demonstrate that they have taken a reimbursable meal.

While there was signage at breakfast, students would benefit from extra training on what constitutes a reimbursable meal at breakfast. Consider the following ideas:

- Additional signage on the meal service line to indicate the amounts students must select and how each food item counts (i.e., one item or two items)
- Verbal reminders from food service staff as to what the students must select
- Announcement over the P.A. system and/or school newsletters
- Brief in-service with students and food service staff on requirements for both breakfast and lunch

02/18/2020	1691	Α	dministrative	FSD		
		R	Review			

# Administrative Review Report

Code of Federal Regulations, Title 7, Agriculture, PT. 210-299, The school food authority shall ensure that the hand storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoil and other loss.	_							
enter elever televi								
02/18/2020         1683         133         Administrative Review         ALL         FSD								
Comments								
The effective eligibility date for a DC eligible student is the date of the original output file.								
02/17/2020 1675 709 Administrative ALL FSD Review								
Comments								
Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines. • The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The DPI Nonprogram Food Revenue Tool/Calculator located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx								
02/17/2020 1673 700 Administrative ALL FSD Review								
Comments								
All revenues, including reimbursements and student payments, and expenses, including food, labor, equipment, purchased services, and other need to be allocated to the program to which they belong. The Annual Financial Report instructions are located on the DPI website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf). The purchase record template on the DPI website https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/purchase-record-revenue-template-monthly.xlsx may aid in this expense and revenue separation  O2/05/2020  1547  810  Administrative  ALL  FSD								
Review								
Comments								
When including the non-discrimination statement on letters, website, and other documents used to convey program information, it is necessary to use the current unaltered statement which was updated in 2015 (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights). However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, "This institution is an equal opportunity provider." Either of these statements must be in the same size font as the other text in the document.								
01/14/2020 1309 1005 Administrative ALL FSD Review								
Comments								
The Triennial Assessment must be complete by June 30, 2020. Complete the WellSAT (wellsat.org) to assess how your policy compares to a model policy. There is a section at the end of this tool to include your WellSAT results. Once the Local Wellness Policy Report Card form is submitted, a report will be generated and emailed to you. This report can be used to communicate the triennial assessment results to the public.								